

**From:** Grimaldi, Andrea [Andrea.Grimaldi@ed.gov]

**Sent:** Monday, November 19, 2007 10:05 AM

**To:** Darton, Terry

**Subject:** Response and COMMENT ON A DRAFT STATE OPERATING PERMIT and Additional Issues FOR THE MIRANT Potomac River Generating Station

I support the City of Alexandria's opinion that the draft permit, in its present form, would allow the plant to significantly increase emissions back to the historically highest levels due to excessively high PM and NO<sub>x</sub> emission limits. Public health would be seriously compromised due to exposure to PM<sub>2.5</sub> emissions, and the City requests that VDEQ and SAPCB determine a proper and more stringent PM limits for the plant.

As a resident of the city of Alexandria who owns a home in close proximity to plant protecting the health of my neighbors and myself is of great importance and I do not believe that the proposed draft operating permit and its basis and the recommendations of the DEQ address public health.

Long term, not short term alone, emissions limits should be established, and a minimum of ANNUAL testing of reporting of emissions and monitoring systems utilization be conducted with the results made easily and readily available to the general public in a transparent manner.

And the use of trona without evidence of any scientific, evidence based empirical data and studies is irresponsible.

Public Health and Environmental Health should be first and foremost-not meeting minimum standards, cost effective measures and business interests.

In response to the following questions:

1. PM CEMS should be required as part of this SOP for compliance purpose. With the use of trona, opacity data shows significant potential for increased PM emissions. The technology to install PM CEMS is commercially available and the immediate installation of CEMS should be a requirement of this permit.
2. The operating performance of the control equipment for sulfur dioxide should be the basis for permit limitations for all operating scenarios and Mirant should optimize its pollution control devices at all times to minimize emissions and the impacts to the population and environment
3. I agree with the city and object to any permit that allows Mirant PRGS to use intermittent controls to show compliance with NAAQS. Varying SO<sub>2</sub> control rates would be considered intermittent controls which are prohibited under federal and state regulations (40 CFR 51.100(nn), 40 CFR 51.100(hh)(1)(ii) and 9 VAC 5-10-20
4. The permit emission rates for SO<sub>2</sub> should be established to ensure the optimal use of trona at all times. The proposed minimum sulfur content requirement can be eliminated from the permit, but the maximum sulfur content of coal should not be relaxed and should stay at 0.9%. Relaxing this would mean more trona use, and thus PM emissions
5. The Clean Air Interstate Rule (CAIR) and Clean Air Mercury Rule (CAMR) requirements should be included in the permit since they are federally enforceable. Also, the more stringent limits (the proposed limits and CAIR/ CAMR) that are protective of NAAQS must be the permit limits

6. The NO<sub>x</sub> and PM emission limits must be much more stringent to protect the NAAQS and public health.

7. The proposed parametric monitoring is not adequate to ensure good ESP performance at all times since it cannot readily detect unforeseen operating difficulties as well as changing particulate loading at the inlet of these devices. Thus, it cannot replace the use of PM CEMS which directly measure PM emissions. Commercial availability of these PM CEMS are available.

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